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May 19, 2022

VIA ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Application GRANTED. The initial pretrial conference is adjourned to **August 30, 2022, at 3:00 p.m.** The Clerk of Court is directed to terminate ECF No. 19. SO ORDERED.



May 19, 2022

Re: Consent Letter Request to Adjourn Initial Conference from July 19, 2022 to August 19, 2022 or a date thereafter.

Fynan v. Kavulich & Associates, P.C., et al., Case 1:22-cv-02892-JMF

Dear Judge Furman:

The undersigned represents the Plaintiff Michael Fynan in this lawsuit against Defendants Kavulich & Associates, P.C., Gary Kavulich (collectively “Kavulich Defendants”), Wick Holding Corp., and Langsam Property Services Corp. (collectively “Landlord Defendants”) for violations of the FDCPA and related state law.

Plaintiff writes to request an adjournment of the initial conference currently scheduled for July 19, 2022 by 30 days to August 19, 2022 or a date thereafter on which this Court is available. Plaintiff’s counsel has multiple conflicts for both the initial conference and the required mediation to be held by 2 weeks prior to the initial conference (July 5, 2022).

Kavulich Defendants have consented to this request. Neither Plaintiff nor Kavulich Defendants have yet been contacted by any counsel representing the Landlord Defendants, who were served on May 17, 2022, and are required to respond to the Complaint by June 7, 2022.

This is the first request for an adjournment in this matter and the first request for an adjournment of this initial conference.

Thus Plaintiff requests that the initial conference be adjourned by 30 days from July 19, 2022 to August 19, 2022 or a date thereafter on which this Court is available, and correspondingly the deadline to hold a mediation be extended from July 5, 2022 to August 5, 2022.

Respectfully,

/s/

Ahmad Keshavarz, Esq.